



Arent Fox LLP / Attorneys at Law  
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August 27, 2021

VIA ECF

Honorable Edward S. Kiel  
United States Magistrate Judge for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Eric Biderman**

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Re: Ameritas Life Ins. Corp. v. Wilmington Trust, N.A., USDCNJ no. 2:19-cv-18713

Dear Judge Kiel:

As you are aware, we represent non-party Life Equity, LLC ("Life Equity"). On behalf of Life Equity, we write to request an additional two week adjournment of today's deadline regarding searches for documents in response to Plaintiff Ameritas Life Insurance Corp.'s ("Ameritas") subpoena per Your Honor's July 14, 2021 Order for a joint report to the Court and Your Honor's prior Order of August 16, 2021 granting our prior request for a two-week adjournment. During the past two weeks, we have been conferring with our client and counsel for Ameritas regarding additional in response to Ameritas' subpoena. Although the parties have not reached an agreement, we are in the process of conferring with our client to formulate a proposal to Ameritas that we hope will resolve this matter. The additional two weeks requested will afford our client and us the necessary time to formulate the proposal, receive Ameritas' response and see if a resolution can be reached between the parties. We have reached out to counsel for Ameritas and they have consented to this request. As expressed to counsel for Ameritas, if the requested extension is granted, our client will not be seeking any additional extensions absent an agreement with Ameritas that resolves the matter. If the extension is granted, the new deadline would fall on Friday, September 10, 2021.

Sincerely,

/s/Eric Biderman  
Eric Biderman

*Attorney for Life Equity, LLC*